UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

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PROPOSED ATTORNEYS FOR DEBTOR

In re:

LTL MANAGEMENT LLC,¹

Debtor.

LTL MANAGEMENT LLC,

Plaintiff,

v.

THOSE PARTIES LISTED ON APPENDIX A TO COMPLAINT and JOHN AND JANE DOES 1 1000,

Defendants.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

Adv. No.: 23-01092 (MBK)

NOTICE OF AMENDED² AGENDA OF MATTERS SCHEDULED FOR HEARING ON MAY 16, 2023 AT 10:00 A.M.

NAI-1536792023

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The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

² Amended agenda items appear in bold.

At the direction of the Court, the hearing will be held via Zoom only. All parties who intend to present argument should contact Chambers at chambers_of_mbk@njb.uscourts.gov and provide the name and email address of the speaker, as well as provide information regarding the party the speaker represents and/or the purpose of the appearance.

Parties are directed to https://www.njb.uscourts.gov/LTL for observing via Zoom.

Please take notice that in light of the additional filings, tomorrow's hearing (May 16, 2023) will now begin at 10:00 a.m.

STATUS CONFERENCES GOING FORWARD IN BASE CASE

- 1. At the direction of the Court, a status conference will go forward to discuss the scheduling of additional omnibus hearing dates.
- 2. Motions to Dismiss the Chapter 11 Case [Dkts. 286, 335, 346, 350, 352, 358, 379, 384, 473, 480].

Status: The Court will conduct a conference to hear any updates from the parties on the scheduling of the pending motions to dismiss.

3. Debtor's Motion for an Order (I) Scheduling Hearing on Approval of Disclosure Statement; (II) Establishing Disclosure Statement Objection Deadline; and (III) Granting Related Relief [Dkt. 240] (the "<u>Disclosure Statement Hearing Motion</u>").

Status: A status conference on this matter is going forward pursuant to the Court's May 4, 2023 order.

Objection Deadline: May 5, 2023.

Related Documents:

- A. Application for Order Shortening Time and Certain Other Relief [Dkt. 241].
- B. The Official Committee of Talc Claimants' Objection to Debtor's Application for Order Shortening Time with Respect to Debtor's Motion for an Order
 (I) Scheduling Hearing on Approval of Disclosure Statement; (II) Establishing Disclosure Statement Objection Deadline; and (III) Granting Related Relief [Dkt. 254].
- C. Order Denying Application to Shorten Time [Dkt. 272].
- D. The Official Committee of Talc Claimants' Cross-Motion for Entry of an Order (I) Temporarily Suspending the Debtor's Chapter 11 Case Pursuant to 11 U.S.C. §§ 105 and 305, and (II) Granting Related Relief [Dkt. 414] (the "Motion to Suspend").

- E. The Ad Hoc Committee of Supporting Counsel's Reply in Support of the Disclosure Statement Hearing Motion [Dkt. 498].
- F. The Debtor's Reply in Support of Disclosure Statement Hearing Motion [Dkt. 500].

Objections:

- G. The Official Committee of Talc Claimants' Objection to Disclosure Statement Hearing Motion [Dkt. 413].
- H. Arnold & Itkin LLP's Objection to Disclosure Statement Hearing Motion [Dkt. 443].
- I. The United States Trustee's Objection to Disclosure Statement Hearing Motion [Dkt. 448].
- J. MRHFM's Objection to Disclosure Statement Hearing Motion [Dkt. 453].

CONTESTED MATTERS GOING FORWARD IN THE BASE CASE AND THE ADVERSARY PROCEEDING

4. Motion to Suspend.

Status: This matter is going forward.

Objection Deadline: May 12, 2023.

Related Documents:

- A. The Disclosure Statement Hearing Motion.
- B. MRHFM's Joinder to Motion to Suspend [Dkt. 503].
- C. The Official Committee of Talc Claimants' Reply in Support of Motion to Suspend [Dkt. 517].

Objections:

- D. The Ad Hoc Committee of Supporting Counsel's Objection to the Motion to Suspend [Dkt. 497].
- E. The Debtor's Objection to the Motion to Suspend [Dkt. 501].
- 5. The Official Committee of Talc Claimants' Motion for Entry of a Protective Order [Dkt. 439] (the "Committee Motion for Protective Order").

Status: This matter is going forward.

<u>Objection Deadline</u>: At hearing, pursuant to the Order Granting the Application to Shorten Time [Dkt. 444] (the "Order Shortening Time").

Related Documents:

- A. Application for Order Shortening Time and Certain Other Relief [Dkt. 442] (the "Application to Shorten Time").
- B. Order Shortening Time.
- C. The Debtor's Cross-Motion for Protective Order [Dkt. 491] (the "<u>Debtor's</u> Motion for Protective Order").

Objections:

- D. The Debtor's Objection to the Committee Motion for Protective Order [Dkt. 492].
- 6. The Official Committee of Talc Claimants' Motion to De-Designate Exhibit A of Term Sheet [Dkt. 440] (the "Motion to De-Designate").

Status: This matter is going forward.

Objection Deadline: At hearing, pursuant to the Order Shortening Time.

Related Documents:

- A. The Application to Shorten Time.
- B. The Order Shortening Time.
- C. The Committee Motion for Protective Order.
- D. Certain Creditor Mesothelioma Claimants' Objection to the Debtor's Confidentiality Designations [Adv. Dkt. 95].
- E. The Official Committee of Talc Claimants' Correspondence to the Court [Adv. Dkt. 98].
- F. MRHFM's Objection to Debtor's Confidentiality Designations [Adv. Dkt. 99].
- G. MRHFM's Joinder to the Motion to De-Designate [Dkt. 507].

Objections:

H. The Debtor's Objection to the Motion to De-Designate [Dkt. 523; Adv. Dkt. 136].

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7. The Official Committee of Talc Claimants' Motion to Compel [Dkt. 441] (the "Motion to Compel").

Status: This matter is going forward.

Objection Deadline: At hearing, pursuant to the Order Shortening Time.

Related Documents:

- A. The Application to Shorten Time.
- B. The Order Shortening Time.
- C. MRHFM's Joinder to the Motion to Compel [Dkt. 528].

Objections:

- D. Johnson & Johnson's Objection to the Motion to Compel [Dkt. 519].
- E. The Debtor's Objection to the Motion to Compel [Dkt. 524].
- 8. The Debtor's Cross-Motion for a Protective Order.

Status: This matter is going forward.

Objection Deadline: At hearing, pursuant to the Order Shortening Time.

Related Documents:

- A. The Application to Shorten Time.
- B. The Order Shortening Time.
- C. The Committee Motion for Protective Order.
- D. The Motion to De-Designate.
- E. The Motion to Compel.

Objections:

- F. The Official Committee of Talc Claimants' Objection to the Debtor's Cross-Motion for a Protective Order [Dkt. 510].
- 9. The Official Committee of Talc Claimants' Motion to Compel Unredacted Documents [Dkt. 504] (the "Second Motion to Compel").

Status: This matter is going forward.

<u>Objection Deadline</u>: At hearing, pursuant to the Order Granting Application for Order Shortening Time and Certain Other Relief [Dkt. 509] (the "<u>Order Shortening Time and Other Relief</u>").

Related Documents:

- A. Application for Order Shortening Time and Certain Other Relief [Dkt. 505].
- B. Order Shortening Time and Other Relief.

Objections:

C. The Debtor's Objection to the Second Motion to Compel [Dkt. 529].

Dated: May 15, 2023 WOLLMUTH MAHER & DEUTSCH LLP

/s/ Paul R. DeFilippo

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